

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

DEC 12 2019

UNITED STATES OF AMERICA

v.

JASMINE A. STANLEY,

CASE NUMBER:

Magistrate Judge Sidney I. Schenkier
United States District Court

19CR

928

MAGISTRATE JUDGE SCHENKIER

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about October 16, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant violated:

Code Section

Title 18, United States Code, Section
2251(a)

Offense Description

knowingly employed and used a minor, namely Victim A, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction defendant knew and had reason to know would be transported and transmitted using any means and facility of interstate and foreign commerce, and which visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce

This criminal complaint is based upon these facts:

X Continued on the attached sheet.



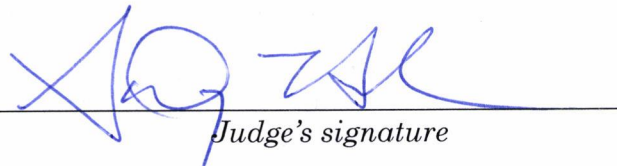
ANTHONY STACK

Task Force Officer, Federal Bureau of
Investigation (FBI)

Sworn to before me and signed in my presence.

Date: December 12, 2019

City and state: Chicago, Illinois



Judge's signature

SIDNEY I. SCHENKIER, U.S. Magistrate Judge
Printed name and Title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

ss

AFFIDAVIT

I, ANTHONY STACK, being duly sworn, state as follows:

1. I am a Task Force Officer with the Federal Bureau of Investigation, and have been so employed since approximately January 2012. Since 2003, I have been employed by the Cook County Sheriff's Police Department, where I have been a member of the Child Exploitation Unit since 2008. My current responsibilities include the investigation of child exploitation and child pornography.

2. This affidavit is submitted in support of a criminal complaint alleging that Jasmine A. STANLEY, has violated Title 18, United States Code, Section 2251(a). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging STANLEY with production of child pornography, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, and on information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts, including Jasmine STANLEY.

I. FACTS SUPPORTING PROBABLE CAUSE

4. According to records provided to law enforcement by Facebook.com, on October 16, 2019, a Facebook account registered to the defendant, with an email address of jasminestamley25@gmail.com¹, transmitted a total of 5 sexually explicit images of Victim A's pubic area to Individual A's Facebook account through the Facebook.com website.

5. According to the records provided by Facebook, on October 16, 2019, the defendant engaged in an online chat with Individual A, who instructed the defendant to take sexually explicit photographs of Victim A. For example, in one exchange after defendant sent Individual A multiple sexually explicit photographs of Victim A's pubic area, Individual A instructed the defendant to "Open it up a lil." The defendant responded by using her fingers to spread open Victim A's vagina and defendant then took a photograph of Victim A's pubic area and transmitted the photograph to Individual A through the Facebook.com platform.

6. On December 11, 2019, defendant was interviewed by law enforcement in a video-recorded interview. After being informed of her *Miranda* rights and agreeing to speak to law enforcement, defendant acknowledged that she was the user of the Facebook account that transmitted the images of child pornography to Individual A. The defendant further explained that in October 2019 she drove from

¹ During her interview with law enforcement on December 11, 2019, defendant stated that when she originally registered her gmail account she mistakenly typed "stamley" instead of "stanley" and decided to keep the address with the typo.

Chicago, Illinois to Wisconsin to pick up Victim A, who defendant stated was approximately 1 year old, for purposes of the defendant babysitting Victim A for a one week time period. The defendant stated that after transporting Victim A back to Chicago she later engaged in a conversation with Individual A utilizing defendant's Facebook account.


7. The defendant explained that during her online conversation with Individual A, Individual A offered her approximately \$700 to take sexually explicit photographs of Victim A. Defendant stated she sent Individual A her electronic banking information for purposes of Individual A sending her the money. The defendant acknowledged that during this conversation with Individual A she took multiple sexually explicit photographs of Victim A and manipulated Victim A's vagina as instructed by Individual A in one of the photographs.

8. The defendant stated that she used her I-Phone to take the sexually explicit images of Victim A. The defendant further acknowledged that she utilized her i-Phone to access her Facebook.com account and to transmit the images of Victim A to Individual A. Based on my training and experience, I know that i-Phones are manufactured outside the United States.

9. The defendant viewed and initialed the recovered child pornography images recovered from the defendant's Facebook account and acknowledged that she took the photographs and transmitted them to Individual A. The defendant identified Victim A as a one year old minor female.

10. Based on the above information, there is probable cause to believe that Jasmine STANLEY knowingly employed and used a minor, namely Victim A, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction defendant knew and had reason to know would be transported and transmitted using any means and facility of interstate and foreign commerce, and which visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce.

FURTHER AFFIANT SAYETH NOT.



Anthony Stack
Task Force Officer
Federal Bureau of Investigation

Subscribed and sworn
before me this 12th day of December, 2019



Honorable Sidney I Schenkier
United States Magistrate Judge